

SEP 23 2015

WATER QUALITY PROGRAM



## PALMER COKING COAL CO, LLP

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September 18, 2015

Carrie Graul - S&G General Permit Comments  
Washington DOE  
P.O. Box 47696  
Olympia, WA 98504-7696

Re: Draft Sand &amp; Gravel General Permit

Dear Ms. Graul:

We provide the following comments on the draft Sand &amp; Gravel General Permit:

S5 Site Management Plan, D. – The requirement requirement to have a four character identifier for each outfall location is silly. If we have less than 10 outfall locations, why would we need any more than one digit or character?

S5 Site Management Plan – The long list of all features that must be identified is cumbersome and will be difficult without survey and other costly mapping.

G7 Engineering Plan Review Required – This provision is far too cumbersome and counterproductive. The engineering costs alone would be prohibitive as would the required studies, investigations, and design costs. This section should be stricken.

G20 Duty to Reapply – The requirement that applicants file an application electronically should be stricken. The DOE's Water Quality Permitting Portal is a cumbersome and clunky site which took our company hours to master due to poor design.

There are a number of other provisions throughout the Draft Sand & Gravel Permit, which are complicated and serve little interest except bureaucracy and higher compliance costs for permit holders. The Washington Aggregate & Concrete Association (WACA), of which we are a member, will be pointing out dozens more provisions which must be fundamentally altered. Our company agrees with the WACA position that these new provisions will substantially increase the cost of compliance and will impose severe administrative and regulatory burdens as well as significantly new costs to an industry with a good track record of proven NPDES success.

Very Truly Yours,

William Kombol, Manager  
Palmer Coking Coal Company